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Hearing Date: November 15, 2024
Time: 10:30 a.m.

Objection Deadline: November 8, 2024
Time: 5:00 P.M.

Attorneys for 58 Dobbin Funding L.P.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

58 DOBBIN LLC,

Case No. 24-44179-ESS
and 24-4111-ESS

Debtor.

Hon. Elizabeth S. Stong
United States Bankruptcy Judge

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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Motion (the “Motion”) of 58 Dobbin Funding L.P. (the “Secured Creditor”), by and through its attorneys, Kriss & Feuerstein LLP, will move at a remote hearing by using the Zoom for Government® videoconferencing platform, before the Honorable Elizabeth S. Stong, United States Bankruptcy Judge, at the United States Bankruptcy Court of the Eastern District of New York, located at 271-C Cadman Plaza East, Courtroom 3585, Brooklyn, NY 11201, on November 15, 2024 at 10:30 a.m., or as soon thereafter as counsel can be heard, for entry of an Order: (i) granting relief from the automatic stay for cause pursuant to 11 U.S.C. §§ 105(a), 361, 362(d)(1), and 362(d)(2), so that it may exercise all rights and remedies available to it under applicable law with respect to the real property commonly known as 58 Dobbin Street, Brooklyn, New York 11222 (Block: 2643, Lot: 52) (the “Property”);

(ii) granting *in rem* relief and/or prospective relief pursuant to 11 U.S.C. §§ 105(a), and 362(d)(4), such that the automatic stay from any future filings under the Bankruptcy Code by the Dobbin Debtor and/or any person or entity having or claiming an interest in the Property within two (2) years shall not attach to the Property; (iii) waiving the fourteen (14) day stay imposed by FED. R. BANKR.P. 4001(a)(3); and (iv) granting such further and different relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that all hearing participants must register with eCourt Appearances not less than 24 hours in advance of all appearances. The dial-in information and/or video link will be provided by email after registration with eCourt Appearances. Please see <https://www.nyeb.uscourts.gov/content/judge-elizabeth-s-stong> for further information.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the instant application must be made in writing and received in the Bankruptcy's Court Clerk's office at the United States Bankruptcy Court of the Eastern District of New York, located at the United States Courthouse located at 271-C Cadman Plaza East, Brooklyn, NY 11201, to the Office of the United States Trustee for the Eastern District of New York, Alexander Hamilton Custom House, One Bowling Green, Suite 510, New York, New York 10004, and to the undersigned, Kriss & Feuerstein LLP, 360 Lexington Avenue, 12th Floor, New York, New York 10017 no later than seven (7) days before the hearing date set forth herein.

Dated: New York, New York
October 22, 2024

KRISS & FEUERSTEIN LLP
Attorneys for 58 Dobbin Funding L.P.

s/ Daniel N. Zinman
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To:

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New York City Department of Finance
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Collections Unite-RPT Taxes
375 Pearl Street, 30th Floor
New York, NY 10038

NYC Water Board
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Newark, NJ 07101

New York City Water Board
Department of Environmental Protection
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